

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN - NORTHERN DIVISION**

In the Matter of:

CHERYL LYNN RAMIREZ

**CHAPTER 13 PROCEEDING
CASE NUMBER: 23-20998
HONORABLE DANIEL S. OPPERMAN**

Debtor(s)

_____ /

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

NOW COMES Thomas W. McDonald, Jr., Chapter 13 Trustee, and hereby objects to the debtor(s) Chapter 13 Plan as follows:

1. The Debtor has failed to make adequate interim plan payments contrary to 11 U.S.C. §1326(a)(1).
2. The debtor(s) Chapter 13 plan is not feasible due to the higher than scheduled regular mortgage payment and arrearage claim filed. The funding of the plan is not sufficient to pay claims as filed, and there will be no distribution to unsecured creditors.

WHEREFORE, the Chapter 13 Trustee prays this Court deny Confirmation of the proposed Chapter 13 Plan.

Dated: October 17, 2023

/s/Thomas W. McDonald, Jr.
Thomas W. McDonald, Jr. (P32464)
Chapter 13 Trustee
3144 Davenport Avenue
Saginaw, Michigan 48602
Telephone: (989) 792-6766
ecf@mcdonald13.org

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CERTIFICATE OF SERVICE OBJECTION TO CONFIRMATION

I, the undersigned, do hereby certify that on October 17, 2023, I have electronically filed the foregoing papers with the Clerk of the Court using the ECF systems which will send notification to any party registered with the ECF System, and hereby certify that I have mailed by United States Postal Service the Papers to the following non-ECF participants:

Cheryl Ramirez
829 Pawtucket Drive
Hope, Michigan 48628

/s/Jennifer Drzewicki
Jennifer Drzewicki
Office of Thomas W. McDonald, Jr.
Chapter 13 Trustee
3144 Davenport Avenue
Saginaw, Michigan 48602
Telephone: (989) 792-6766
ecf@mcdonald13.org